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REDACTED FOR
PUBLIC DISCLOSURE

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA

United States of America,

Plaintiff,

vs.

Jennifer Tavares,

Defendant.

No. CR-24-1613-PHX-DJH (ASB)

INDICTMENT

VIO: 18 U.S.C. § 924(a)(1)(A)
(False Statement During the
Purchase of a Firearm)
Count 1

18 U.S.C. §§ 922(a)(6) and
924(a)(2)
(Material False Statement During the
Purchase of a Firearm)
Count 2

18 U.S.C. §§ 924(d) and 981,
21 U.S.C. §§ 853 and 881, and
28 U.S.C. § 2461(c)
(Forfeiture Allegation)

THE GRAND JURY CHARGES:

COUNT 1

On or about May 22, 2024, in the District of Arizona, Defendant JENNIFER TAVARES knowingly made a false statement and representation to AV AZ Firearms, a business licensed under the provisions of Chapter 44 of Title 18, United States Code, with respect to information required by the provisions of Chapter 44 of Title 18, United States Code, to be kept in the records of AV AZ Firearms, in that Defendant JENNIFER TAVARES executed a Department of Justice Bureau of Alcohol, Tobacco, Firearms and

1 Explosives Form 4473, Firearms Transaction Record, stating that Defendant JENNIFER
2 TAVARES was the actual transferee/buyer of a firearm, whereas in truth and fact,
3 Defendant JENNIFER TAVARES knew that she was buying the firearm on behalf of
4 another person.

5 In violation of Title 18, United States Code, Section 924(a)(1)(A).

6 **COUNT 2**

7 On or about June 1, 2024, in the District of Arizona, Defendant JENNIFER
8 TAVARES knowingly made a false statement and representation in connection with the
9 acquisition of a firearm to Baseline Pawn, which was intended and likely to deceive the
10 Baseline Pawn as to a fact material to the lawfulness of a sale of a firearm by the business,
11 which was licensed under the provisions of Chapter 44 of Title 18, United States Code,
12 with respect to information required by the provisions of Chapter 44 of Title 18, United
13 States Code, to be kept in the records of Baseline Pawn, in that Defendant JENNIFER
14 TAVARES did execute a Department of Justice, Bureau of Alcohol, Tobacco, Firearms
15 and Explosives Form 4473, Firearms Transaction Record, stating she was the actual buyer
16 or transferee of the firearm, and was not buying the firearm on behalf of another person,
17 whereas in truth and fact, Defendant JENNIFER TAVARES knew that she was buying the
18 firearm on behalf of another person.

19 In violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

20 **FORFEITURE ALLEGATION**

21 The Grand Jury realleges and incorporates the allegations of Counts 1 and 2 of this
22 Indictment, which are incorporated by reference as though fully set forth herein.

23 Pursuant to 18 U.S.C. §§ 924(d) and 981, 21 U.S.C. §§ 853 and 881, and 28 U.S.C.
24 § 2461(c), and upon conviction of the offenses alleged in Counts 1 and 2 of this Indictment,
25 Defendant shall forfeit to the United States of America all right, title, and interest in (a)
26 any property constituting, or derived from, any proceeds the persons obtained, directly or
27 indirectly, as the result of the offense, and (b) any of Defendant's property used, or intended
28 to be used, in any manner or part, to commit, or to facilitate the commission of, such offense

1 as to which property Defendant is liable,

2 If any forfeitable property, as a result of any act or omission of Defendant:

3 (1) cannot be located upon the exercise of due diligence,

4 (2) has been transferred or sold to, or deposited with, a third party,

5 (3) has been placed beyond the jurisdiction of the court,

6 (4) has been substantially diminished in value, or

7 (5) has been commingled with other property which cannot be divided without
8 difficulty,

9 it is the intent of the United States to seek forfeiture of any other property of said Defendant
10 up to the value of the above-described forfeitable property, pursuant to 21 U.S.C. § 853(p).

11 All in accordance with Title 18, United States Code, Sections 924(d) and 981, Title
12 21, United States Code, Sections 853 and 881, Title 28, United States Code,
13 Section 2461(c), and Rule 32.2, Federal Rules of Criminal Procedure.

14 A TRUE BILL

15
16 /s/
FOREPERSON OF THE GRAND JURY
Date: October 1, 2024

17
18 GARY M. RESTAINO
19 United States Attorney
District of Arizona

20
21 /s/
SHEILA PHILLIPS
22 Assistant U.S. Attorney